

Washington County Rural Telephone Cooperative, Inc.
PO Box 9 · 105 E. Railroad Street · Pekin, Indiana 47165

March 6, 2014

Via Electronic Comment Filing System

Ms. Marlene H. Dortch
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

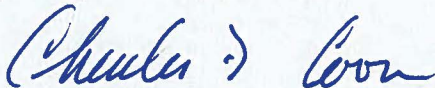
Re: WC Docket No. 10-90 –Expression of Interest in Conducting Rural Broadband Experiment

Dear Ms. Dortch:

Enclosed for electronic filing via the Electronic Comment Filing System (“ECFS”) in compliance with Federal Communications (“FCC”) Order, FCC 14-5, is the attached non-binding Expression of Interest (“EOI”) for Washington County Rural Telephone Cooperative, Inc. (“WCRTC”) regarding the Connect America Phase II network experiments. WCRTC appreciates the opportunity to file the non-binding EOI.

If you have any questions or concerns on the attached EOI, please contact me.

Respectfully Submitted,



Charles F. Coon
General Manager
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(812) 967-5501

Attachments (Non-binding EOI)

Non-Binding Expression of Interest – Phase II Rural Broadband Experiment

Washington County Rural Telephone Cooperative, Inc. ("WCRTC") submits this Expression of Interest ("EOI") for Connect America Phase II Rural Broadband Experiments per Federal Communications Commission ("FCC") Order, FCC 14-5. This is Stage 1 of the FCC's Phase II experiment proposals and WCRTC anxiously awaits release of the Stage 2 formal proposal requirements.

Background

WCRTC has a proven success rate of deploying rural high-speed last mile broadband networks. We have been in the telecommunications industry since 1952 deploying high quality voice as well as broadband services today. As a rural independent local exchange carrier, WCRTC has Eligible Telecommunication Carrier ("ETC") status within the state of Indiana. WCRTC has been and currently is a recipient of Universal Service Funding and has extensive experience with the requirements of filing required reports and maintaining support.

Proposed Service Area

WCRTC's proposed broadband deployment experiment includes four rural areas located in southern Indiana. The proposed areas of service cover the following census tract numbers within four counties in Indiana: 18043071003, 18043071004, 18061060100, 18143966900, 18175967200, 18175967600, and 18175967700 and are contiguous to our existing service area. Completion of the proposed project would represent an edge out from our current operations. Based on the Federal Communication Commissions ("FCC") Public Notice, DA 14-154, report dated February 5, 2014 for price cap areas, the proposed project is estimated to provide broadband access to a total of 879 eligible high cost locations once completed, with 28 of the locations considered as extremely eligible high cost locations.

WCRTC is unable to determine the total number of Community Anchor Institutions ("CAIs") located within the proposed project since the eligible unserved high cost census blocks within the seven selected census tracts have yet to be identified, however WCRTC currently services many CAIs within its current exchange area and, if funded, could offer scalable high-speed broadband to CAIs located within the proposed service area.

Broadband Technology

WCRTC anticipates using Fiber-to-the-Premise ("FTTP") for this proposed project area in order to build a high-speed, robust, scalable broadband network. The proposed area is adjacent to WCRTC's current service area and the existing fiber network can be reinforced to provide service to the proposed area. WCRTC's proposed area is sparsely populated, diminishing economies of scale for any broadband access technology, wired or wireless. A fiber optic network will support the continually steeply increasing broadband demand for the long term without prohibitive upgrade costs. The FTTP network architecture will provide a robust, broadband networking solution that offers virtually unlimited bandwidth and the flexibility to meet the customer demand. FTTP technology will enable WCRTC the ability to offer a variety of communications and entertainment services, including carrier-class telephony, high-speed Internet access, digital multimedia, Voice over Internet Protocol (VoIP), and interactive, two-way broadband services. WCRTC has extensive experience with building and maintaining an extensive fiber network.

Service Offerings

The service offerings anticipated by WCRTC are voice service, video service, and high-speed broadband service. WCRTC expects to be available to offer high-speed broadband up to 100 Mbps to all homes and businesses passed, including CAIs within the proposed project area. The pricing has not yet been determined by WCRTC, but is expected to be similarly priced with services offered currently in the surrounding area and WCRTC's exchange area. WCRTC anticipates the project to be completed within three years of project award.

Funding

WCRTC is unable to determine the total cost of the proposed project since the eligible unserved high cost census blocks within the seven selected census tracts have yet to be identified, however based on fiber network experience WCRTC estimates this project to have a high level total cost estimate of around \$7.6 million dollars. In order to get the project started, the requested funding amount will be one time support of around \$3.1 million dollars and the remaining \$4.5 million requested over a three year period. The funding request is due to the cost of building a robust, scalable, high-speed broadband and voice network in rural Indiana. Once the final rules and budget for the Rural CAF Experiment are released by the FCC, WCRTC will better define the project and costs applicable should a formal proposal be submitted.

Conclusion

WCRTC appreciates the opportunity that the FCC is providing by allowing rural independent local exchange carriers to submit an Expression of Interest for the Rural CAF Experiment. As stated above, WCRTC is considering a FTTP network build within seven census tracts that are located in four counties in rural Indiana. By funding the proposed project, WCRTC can reach out to neighboring areas that lack access to high-speed broadband capabilities in rural Indiana. The WCRTC proposed fiber network would provide the residents, businesses, and CAI's with a high-speed, robust, scalable broadband networking solution that offers virtually unlimited bandwidth to areas that has been lacking service.

WCRTC is committed to providing a solution to the challenges the proposed area residents and businesses have with the current lack of high quality and dependable high speed broadband. WCRTC is an experienced, dedicated, and committed telecommunications provider. The experienced staff of WCRTC is extremely knowledgeable and holds the resources to complete the proposed overbuild and deliver sustainable advanced services to each person who lives and works within the proposed service area. Due to high costs, the proposed project cannot be completed without FCC funding. Thank you for taking this proposed project into consideration as the final rules and budget are set for the available experiments.